

DOCKET NO.: FBT-CV15-6048078-S

: SUPERIOR COURT

JONATHAN SHAPIRO

: JUDICIAL DISTRICT OF  
FAIRFIELD

PLAINTIFF

V.

: AT BRIDGEPORT

FRANK DELBOUNO, JR.  
and CITY OF BRIDGEPORT

: OCTOBER 5, 2016

DEFENDANT

**PLAINTIFF'S SUBMISSION FOR JOINT TRIAL MANAGEMENT REPORT**

As the defendants have not cooperated with the plaintiff's attempts to coordinate a Joint Trial Management Report as required by the Civil Jury Trial Management Order, the plaintiff is constrained to file his own submission unilaterally, and accordingly reserves his right to revise, amend and/or supplement after the defendants have filed their submission.

**1. Description of the Case**

This case involves a motor vehicle collision that occurred on February 15, 2013 at approximately 1:30 p.m. at the intersection of Prospect Street and Myrtle Avenue in Bridgeport, Connecticut. Mr. Shapiro was driving through a

green light at this intersection when Defendant Officer Delbuono, while on duty as a police officer for Defendant City of Bridgeport, drove through a red light, striking Mr. Shapiro's vehicle and causing injuries. As a result of this collision, Mr. Shapiro claims injuries and damages.

**2. Legal and Factual Issues in Dispute**

1. Liability
2. Causation
3. Damages

**3. Witness Lists**

A. Plaintiff's Proposed Witnesses

1. Jonathan Shapiro – Plaintiff
2. JoAnn Shapiro – Fact witness
3. Joseph Shapiro – Fact witness
4. Taise Falcao – Fact witness
5. Dr. Pardeep Sood – Expert/Treating Physician
6. Dr. Louis Cofrancesco – Expert/Treating Physician
7. Police Officer Laracuenta – Fact witness
8. Records custodian from Bridgeport Police Department

9. Lauren Sinko – Fact witness
10. The plaintiff may additionally call and/or introduce records, reports and bills from the following Experts/Treaters:  
  
Representatives from American Medical Response  
  
Representatives from Bridgeport Hospital  
  
Dr. Gary Richo  
  
Representatives from Core Physical Therapy  
  
Dr. Jerold Perlman  
  
Dr. Michael Saffir  
  
Dr. Lawrence Kirschenbaum  
  
Dr. Carr  
  
Representatives from Advanced Radiology  
  
Representatives from Physical Therapy of Southern Connecticut  
  
Representatives from Griffin Hospital  
  
Representatives from Huntington Walk-In
11. The plaintiff reserves the right to identify further witnesses who may become known or identified prior to trial, as well as

those witnesses identified by the defendants and/or who may be offered in rebuttal.

The plaintiff may request permission to call treaters out of order and/or may request other scheduling accommodations as may be necessary for these witnesses.

B. Defendants' Proposed Witnesses

**4. Pending Motions**

The defendants filed a Motion for Protective Order to prevent the plaintiff from taking the deposition of the defendants' expert, Dr. Brown. The plaintiff intends to file a Motion to Preclude Expert Testimony of Dr. Brown and a Motion in Limine addressed to certain evidence.

**5. Operative Pleadings**

1. Complaint
2. Answer and Special Defense (Docket Entry No. 106)
3. Reply to Special Defense (Docket Entry No. 108)
4. Plaintiff's Disclosure of Expert Witness Pursuant to Practice Book

§§ 13-4(b)(2) and/or 13-4(d)(1) (Docket Entry No. 116)

5. Plaintiff's Supplemental Disclosure of Expert Witness (Docket Entry No. 117)
6. Plaintiff's Supplemental Disclosure of Expert Witness (Docket Entry No. 118)
7. Plaintiff's Supplemental Disclosure of Expert Witness (Docket Entry No. 121)
8. Defendants' Disclosure of Expert Witness (Docket Entry No. 125)

**6. Estimate of Time for Jury Selection**

The parties estimate that it will take approximately three to four days to select a jury.

**7. Estimate of Time to Try Case**

The parties estimate that it will take approximately three to four days to try the case.

**8. Anticipated Scheduling Problems**

The plaintiff does not currently anticipate any scheduling problems.

THE PLAINTIFF

BY

  
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Kevin C. Shea  
CLENDENEN & SHEA, LLC  
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New Haven, CT 06511  
203/787-1183

CERTIFICATION:

This is to certify that a copy of the foregoing was sent via e-mail to Russell D. Liskov, Associate City Attorney, Office of the City Attorney at Russell.Liskov@bridgeportct.gov on this 5<sup>th</sup> day of October, 2016.

  
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CLENDENEN & SHEA, LLC